

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

GLADYS HARRISON,
Debtor.

CHAPTER 13
CASE NO. 15-52304-PJS
JUDGE PHILLIP J SHEFFERLY

TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee requires debtor to remit the 2014 income tax refund to the Trustee by a date certain.
2. Trustee requires an affidavit from debtor's daughter regarding her contribution for the payment on the 2011 Impala in the amount of \$291.00.
3. Trustee requests 3 most **recent** pay stubs in order to verify debtor's income from main employment and the third job at Golden Home Health. Trustee requires the pay stubs to be received by the Trustee immediately.
4. Trustee questions debtor's valuation of the real property on Schedule A and requests a recent real property tax bill with State Equalized Value statement and any other documentation upon which debtor relies, as it may affect the best interest of creditors pursuant to 11 U.S.C. § 1325(a)(4).
5. As debtor has failed to timely commence payments, the Trustee requests a future default provision within debtor's Order Confirming Plan requiring debtor to remit payments timely. Should the debtor fail to remit timely payments the Trustee need only provide a Notice of Default providing debtor with 30 days to cure any delinquent payments, otherwise, the case would be dismissed without hearing upon the Trustee's affidavit.

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Krispen S. Carroll, Chapter 13 Trustee

November 12, 2015

/s/ Margaret Conti Schmidt
KRISPEN S. CARROLL (P49817)
MARGARET CONTI SCHMIDT (P42945)
MARIA GOTSIS (P67107)
719 Griswold Street
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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

WILLIAM C BABUT
700 TOWNER STE 1
YPSILANTI, MI 48198-5757

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

GLADYS HARRISON
15432 ORCHARD
ROMULUS, MI 48174-0000

November 13, 2015

_____/s/ Barbara A. Ecclestone
Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
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Suite 1100
Detroit, MI 48226
(313) 962-5035
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